

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

HOWARD RICHARDSON,)	
)	
Plaintiff)	
)	
v.)	Civil Action No. 04-11412-NG
)	
SUSA PARTNERSHIP, L.P.,)	
)	
Defendant.)	

DEFENDANT’S LOCAL RULE 16.1 CERTIFICATION

Defendant, SUSA Partnership, L.P. (“SUSA”), and the undersigned counsel for Defendant, in accordance with Rule 16.1(D)(3) of the Local Rules of the United States District Court for the District of Massachusetts, hereby certify that they have conferred:

- a) with a view to establishing a budget for the cost of conducting the full course – and various alternative courses – of this litigation; and
- b) to consider the resolution of this case through the use of alternative dispute resolution programs, such as those outlined in Local Rule 16.4.

Respectfully submitted,

SUSA Partnership, L.P.

/s/ Amanda S. Rosenfeld

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By: /s/ Stephenie Booher

Stephenie Booher, Director, Corporate Counsel

SUSA Partnership, L.P.

Dated: March 15, 2005